

REMARKS

Claims 1-4, 6-20, 23-35, and 37-40 are pending in the present application. Claims 5, 21, and 36 are canceled. Claims 1, 9, 17, 25, 33, and 38 are amended. Reconsideration of the claims is respectfully requested.

I. 35 U.S.C. § 103, Obviousness

The examiner has rejected claims 1-40 under 35 U.S.C. § 103 as being unpatentable over *Prinzing* (US. 6,496,202) in view of *Nakamura et al.* (US. 6,178,433). This rejection is respectfully traversed.

As to claims 1, 17, and 33, the Office Action states:

As to claims 1, 17 and 33, *Prinzing* discloses a data processing system for customizing a graphical user interface of an application on a data processing system (column 4, line 56 through column 5, line 5) and plural customization formats (column 6, line 38 through column 7, line 43); and initiating customization of the graphical user interface by automatically switching between the first customization format and the second customization format (column 6, lines 60-68 and column 7, lines 1-43). The differences between the claim and *Nakamura et al.* are determining a first customization format and a second customization format; *Nakamura et al.* teaches determining a first customization format (column 5, lines 60-68 and column 7, lines 21-38); determining a second customization format (column 8, lines 20-45). It would have been obvious to one of ordinary skill in the art, having the teachings of *Prinzing* and *Nakamura et al.* before him at the time the invention was made to modify the plural customization formats as taught by *Prinzing*, to include the step of determining these formats of *Nakamura et al.*, in order to allow the user can present the entire host application to the web very quickly while customizing portions of the host applications selectively and gradually as taught by *Nakamura et al.*

Office Action, dated October 6, 2003. Applicant respectfully disagrees. *Prinzing* teaches a method and apparatus for customizing or generating a graphical user interface (GUI) for an application. A model contains an application's data and one or more structural components that are used to identify the GUI components of the view. A factory can build a view using GUI components from multiple look-and-feel standards. See *Prinzing*, col. 4, line 57, to col. 5, line 5. The controller receives inputs and sends change requests to the model, which contains the application data. See *Prinzing*, col. 6, lines 47-

50. This model/view/control (MVC) design is combined with a factory of GUI components to generate a GUI for the application.

In contradistinction, the present invention is concerned with a customizing a web-based interface for a legacy application to allow users to interact with the legacy application through the web-based interface. More particularly, claim 1 recites:

1. A method in a data processing system for customizing a web-based graphical user interface for an application on a data processing system, wherein the application generates a plurality of screens of display, the method comprising:
 - initiating customization of the web-based graphical user interface using a first customization format based on the plurality of screens of display; and
 - responsive to a given event, automatically switching from the first customization format to a second customization format.

Prinzing does not teach or suggest a method for customizing a web-based graphical user interface for an application that generates a plurality of screens of display. Rather, *Prinzing* teaches a method for composing screens of display for an application that otherwise would have no screens of display.

Prinzing does not teach or suggest initiating customization of a web-based graphical user interface using a customization format, as recited in claim 1. The Office Action alleges that *Prinzing* teaches a plurality of customization formats in a seemingly arbitrary, albeit lengthy, portion of the reference. However, the Office Action fails to point out where even a single customization format is taught. Furthermore, Applicant submits that *Prinzing* fails to teach or suggest automatically switching from a first customization format to a second customization format responsive to a given event.

Nakamura teaches a method and system for generating a single file for a plurality of flat hypertext markup language (HTML) files. A dynamic hypertext transfer protocol (HTTP) application operates according to a web macro to present multiple HTML pages using a single file. See *Nakamura*, entire document. *Nakamura* does not make up for the deficiencies of *Prinzing*. The Office Action alleges that *Nakamura* teaches determining a first customization format and second customization format. Again, the Office Action cites seemingly arbitrary, albeit lengthy, portions of the reference and proffers no analysis as to where or how *Nakamura* allegedly teaches the limitations of the instant claims.

Non-analogous art cannot be used to establish obviousness. *In re Pagliaro*, 210 U.S.P.Q. 888, 892 (C.C.P.A. 1981). Although one of ordinary skill in the art is presumed to be aware of all prior art in the field to which the claimed invention pertains, he or she is not presumed to be aware of prior art outside of that field and the field of the problem to be solved; i.e., analogous art. The presently claimed invention is directed towards the field of customizing a web-based graphical user interface for an application, while *Nakamura* is directed towards storing multiple flat HTML files as a single file. Therefore, *Nakamura* is non-analogous art and cannot be used to form a *prima facie* case of obviousness.

Moreover, the Office Action may not use the claimed invention as an "instruction manual" or "template" to piece together the teachings of the prior art so that the invention is rendered obvious. *In re Fritch*, 972 F.2d 1260, 23 U.S.P.Q.2d 1780 (Fed. Cir. 1992). Such reliance is an impermissible use of hindsight with the benefit of Applicant's disclosure. *Id.* Therefore, absent some teaching, suggestion, or incentive in the prior art, *Prinzing* and *Nakamura* cannot be properly combined to form the claimed invention. As a result, absent any teaching, suggestion, or incentive from the prior art to make the proposed combination, the presently claimed invention can be reached only through the an impermissible use of hindsight with the benefit of Applicant's disclosure a model for the needed changes.

Independent claims 17 and 33 recite subject matter addressed above with respect to claim 1 and are allowable for the same reasons. Since claims 2-4, 6-8, 18-20, 22-24, 34, 35, and 37 depend from claims 1, 17, and 33, the same distinctions between *Prinzing* and *Nakamura* and the invention recited in claims 1, 17, and 33 apply for these claims. Additionally, claims 2-4, 6-8, 18-20, 22-24, 34, 35, and 37 recite other additional combinations of features not suggested by the reference. Consequently, it is respectfully urged that the rejection of claims 1-4, 6-8, 17-20, 22-24, 33-35, and 37 is overcome.

With respect to claims 9, 25, and 38, the Office Action states:

As to claims 9, 25 and 38, while *Prinzing* demonstrates retrieving a customization format from a plurality of customization formats (column 6, line 38 through column 7, line 43), *Nakamura et al.* teaches determining if the retrieved customization format recognizes a host application screen among the plurality of host application screens (column 5, lines 60-68 and column 7, lines 21-38) and responsive to the retrieved macro recognizing

the host application screen, executing the retrieved macro to customize the graphical user interface (column 8, lines 20-45).

Office Action, dated October 6, 2003. Applicant respectfully disagrees. As stated above, *Prinzing* does not teach or suggest even a single customization format. Therefore, it follows that *Prinzing* does not teach or suggest a plurality of customization format entry points. The Office Action does not explain why the cited portions allegedly teach the claim limitations. For example, col. 6, line 38, to col. 7, line 43, of *Prinzing* teaches a model/view/control design for an application. However, *Prinzing* does not teach or suggest at least "retrieving a customization format from a plurality of customization formats" and "determining if the retrieved customization format **recognizes a host application screen** among the plurality of host application screens," as recited in claim 9.

Nakamura fails to solve the deficiencies of *Prinzing*. The Office Action again alleges that *Nakamura* teaches the claim limitations, citing seemingly arbitrary portions of the reference. However, *Nakamura* does not teach or suggest at least "retrieving a customization format from a plurality of customization formats" and "determining if the retrieved customization format **recognizes a host application screen** among the plurality of host application screens," as recited in claim 9. *Nakamura* has nothing to do with customization of a graphical user interface for a host application that includes a plurality of screens of display; therefore, *Nakamura*, even as combined with *Prinzing*, cannot teach or suggest the specific steps for customization recited in claim 9.

As stated above, *Nakamura* is non-analogous art and cannot be used to establish a *prima facie* case of obviousness. Furthermore, absent some teaching, suggestion, or incentive in the prior art, *Prinzing* and *Nakamura* cannot be properly combined to form the claimed invention. As a result, absent any teaching, suggestion, or incentive from the prior art to make the proposed combination, the presently claimed invention can be reached only through the an impermissible use of hindsight with the benefit of Applicant's disclosure a model for the needed changes.

Independent claims 25 and 38 recite subject matter addressed above with respect to claim 9 and are allowable for the same reasons. Since claims 10-13, 26-29, and 39 depend from claims 9, 25, and 38, the same distinctions between *Prinzing* and *Nakamura* and the invention recited in claims 9, 25, and 38 apply for these claims. Additionally,

claims 10-13, 26-29, and 39 recite other additional combinations of features not suggested by the reference. Consequently, it is respectfully urged that the rejection of claims 9-13, 25-29, and 39 is overcome.

With respect to claims 14, 30, and 40, the Office Action states:

As to claims 11, 14-16, 27, 30-32 and 40, while Nakamura et al. shows responsive to the retrieved customization format not recognizing the host application screen, exiting the retrieved customization format (column 11, lines 5-40), Prinzing also discloses matching the retrieved customization format to customization format entry points; and responsive to the retrieved customization format matching a customization entry point, reentering the retrieved customization format (column 13, line 32 through column 14, line 20).

Office Action, dated October 6, 2003. Applicant respectfully disagrees. As stated above, *Prinzing* does not teach or suggest a plurality of customization formats. The Office Action does not explain why the cited portions allegedly teach the claim limitations. For example, col. 6, line 38, to col. 7, line 43, of *Prinzing* teaches a model/view/control design for an application. However, *Prinzing* does not teach or suggest at least "establishing a plurality of customization format entry points" and "matching a current screen within the host application to a first customization format entry point from the plurality of customization entry points," as recited in claim 14.

Nakamura fails to solve the deficiencies of *Prinzing*. The Office Action again alleges that *Nakamura* teaches the claim limitations, citing seemingly arbitrary portions of the reference. However, *Nakamura* does not teach or suggest at least "establishing a plurality of customization format entry points" and "matching a current screen within the host application to a first customization format entry point from the plurality of customization entry points," as recited in claim 14. *Nakamura* has nothing to do with customization of a graphical user interface for a host application that includes a plurality of screens of display; therefore, *Nakamura*, even as combined with *Prinzing*, cannot teach or suggest the specific steps for customization recited in claim 14.

As stated above, *Nakamura* is non-analogous art and cannot be used to establish a *prima facie* case of obviousness. Furthermore, absent some teaching, suggestion, or incentive in the prior art, *Prinzing* and *Nakamura* cannot be properly combined to form the claimed invention. As a result, absent any teaching, suggestion, or incentive from the

prior art to make the proposed combination, the presently claimed invention can be reached only through the an impermissible use of hindsight with the benefit of Applicant's disclosure a model for the needed changes.

Independent claims 30 and 40 recite subject matter addressed above with respect to claim 14 and are allowable for the same reasons. Since claims 115, 16, 31, and 32 depend from claims 14 and 30, the same distinctions between *Prinzing* and *Nakamura* and the invention recited in claims 14 and 30 apply for these claims. Additionally, claims 15, 16, 31, and 32 recite other additional combinations of features not suggested by the reference. Consequently, it is respectfully urged that the rejection of claims 14-16, 30-32, and 40 is overcome.

Therefore, the rejection of claims 1-40 under 35 U.S.C. § 103 is overcome.

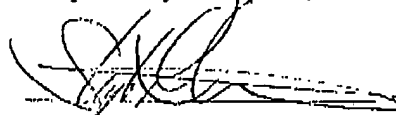
II. Conclusion

It is respectfully urged that the subject application is patentable over the prior art of record and is now in condition for allowance.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,



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